



CITY OF FERNDALE

P.O. Box 936, 2095 Main Street, Ferndale, WA 98248 - (360) 384-4006

August 7, 2012

Kelli Linville
Mayor, City of Bellingham
210 Lottie Street
Bellingham, WA 98225

COPY

RE: Offsite impacts resulting from potential Costco development

Dear Mayor Linville,

The City of Ferndale looks forward to the opportunity to comment on SEPA environmental review related to the construction of a new Costco store at the northeast intersection of Pacific Highway and Bakerview Road, if formal applications are submitted for that site. Such comment will generally be related to mitigation measures necessary to preserve existing Level of Service (LOS) adopted by the City of Ferndale along Slater Road and Exit 260.

As you know, Ferndale has recently amended its required Transportation Element, including an analysis of future development at and around the Slater Road interchange (Exit 260). Ferndale's Comprehensive Plan also identifies improvements that will become necessary at the interchange as the result of growth, such as what has been suggested in Bellingham. Recent correspondence between you and Costco officials has demonstrated the City of Bellingham's expectation that a significant amount of new traffic will be sent along Pacific Highway to Slater Road.

We acknowledge that Bakerview Road and its interchange have exceeded (or are close to exceeding) their capacities and are likely incapable of supporting additional traffic. We understand that the growth of the Bellingham International Airport (which has partially funded new improvements to Bakerview) as well as other private development has stretched the roadway to its limits.

The City of Ferndale has worked with the Washington State Department of Transportation, and has identified a number of measures to ensure that the capacity of the Slater Road interchange is preserved over the 20-year planning period and beyond. The interchange is within the City's Urban Growth Area and the City has accepted the joint responsibility with WSDOT to plan for future growth in that area. The transportation improvements identified by the City's Transportation Element include the construction of two two-lane roundabouts: one associated with the northbound ramps, and one associated with the southbound ramps.

The City has updated its transportation impact fees as well as its concurrency requirements to ensure that these projects are funded and completed, and that private development pays for its share of the costs associated with the projects. The City would expect that any environmental review of the Costco proposal include a review of such impacts, including the number of weekday pm peak hour (4-6pm) trips that a new Costco would generate, as well as other peak impacts (such as weekend and overall trips). Based on our own discussions with Costco, approximately fifty percent of the total trips may utilize this interchange from the north, and the Institute of Traffic Engineers (ITE) Manual likely underestimates the number of trips associated with a Costco store.

With the exception of a four-way signal at Slater and Rural Roads, east-west traffic has no traffic control. The majority of inbound trips would be required to make a stop sign-controlled left-hand turn from the southbound ramp to Slater Road, into traffic that has no stop controls. Outbound trips would be required to make a left-hand turn followed by a right hand turn to access the northbound onramp, again into traffic with no stop controls. Both locations have limited fields of vision, and the impacts of the new trips must be mitigated as a life-safety measure through SEPA.

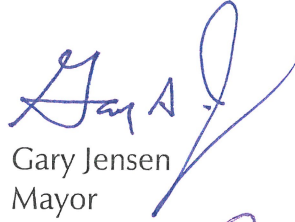
In addition, new vehicles added to the infrastructure for which WSDOT is ultimately responsible (and for which the City has jointly planned, including the establishment of impact fees necessary for project completion) will reduce the capacity of those roadways, and may require that more significant improvements be made to accommodate the new traffic. If these improvements are not consistent with the transportation element improvements (i.e. two-lane roundabouts), the City will require the payment of impact fees to the City. Improvements to the ramps themselves are under the operational control and responsibility of WSDOT, although the City notes that the potential exists for significant backups at the southbound offramp, potentially impacting traffic along Interstate Five's mainline.

The City acknowledges Bellingham's efforts to accommodate growth within its city limits and congratulates you on your apparent success in these efforts. However, the "downstream" impacts of growth, be it an industrial, residential (or in this case) a commercial enterprise must also be analyzed and mitigated for. Areas through which traffic passes should be considered as impacted areas, even if the traffic does not terminate in those areas.

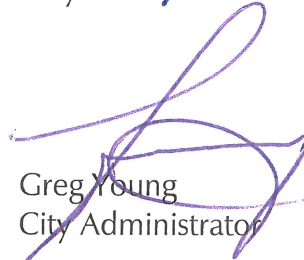
Finally, we note that the City of Ferndale and City of Bellingham share a transportation consultant (the Transpo Group). As a conflict of interest may exist in both jurisdictions utilizing the same consultant, we request that a third-party consultant be required to identify potential impacts and mitigation measures.

Thank you for your consideration of this matter. We look forward to an opportunity to work with you and your staff on discussing the appropriate scope of traffic review for this project. Please do not hesitate to contact Mayor Jensen at 685-2351 if you have any questions.

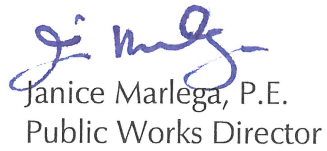
Sincerely,



Gary Jensen
Mayor



Greg Young
City Administrator



Janice Marlega, P.E.
Public Works Director



Jori Burnett
Community Development Director

CC: Jeff Thomas, City of Bellingham SEPA Official
Richard Langabeer, City Attorney